

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

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	:	Chapter 9
In re	:	
	:	Case No. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
	:	Hon. Thomas J. Tucker
Debtor	:	
-----	X	

**STIPULATION FOR ADJOURNMENT OF RESPONSE DATE AND HEARING ON
DEBTOR'S OBJECTION TO CLAIM NO. 2780 FILED BY THOMAS NUNLEY**

Thomas Nunley, the holder of Claim Number 2780, and the City of Detroit, Michigan (the "City"), by and through their undersigned counsel, hereby stipulate to the entry of the Order attached as **Exhibit 1**, and respectfully request that the Court reschedule the hearing on the City's Fifteenth Omnibus Objection to Certain No-Basis Claims (Dkt. No. 9739) as to Claim Number 2780 so that the parties may negotiate the City's proposed settlement on the Claim, as listed on Exhibit 1 hereto or as soon thereafter as the Court may determine and grant such other relief as is proper and just.

Respectfully submitted by:

WHEELOCK P.C. By: <u>/s/ Joshua Wheelock (w/consent)</u> Joshua Wheelock (P76512) 16400 N. Park Drive, Ste. 112 Southfield, MI 48075 Phone: (248) 996-8127 jwheelock@wheelocklegal.com <i>Counsel to Thomas Nunley</i> <i>Dated: August 25, 2015</i>	FOLEY & LARDNER, LLP By: <u>/s/ Tamar N. Dolcourt</u> John A. Simon (P61866) Tamar N. Dolcourt (P73425) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jsimon@foley.com tdolcourt@foley.com <i>Counsel to the City of Detroit, Michigan</i>
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EXHIBIT 1: PROPOSED ORDER

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	:	Hon. Thomas J. Tucker
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**ORDER ADJOURNING RESPONSE DATE AND HEARING ON DEBTOR'S
OBJECTION TO CLAIM NUMBER 2780 FILED BY THOMAS NUNLEY**

Upon the stipulation (the "Stipulation") of the City of Detroit (the "City"), and Thomas Nunley, the holder of Claim Number 2780, for entry of an order adjourning the hearing on the City's Fifteenth Omnibus Objection to Certain No-Basis Claims (Dkt. No. 9739) as to Claim Number 2780 only (the "Objection"); and the Court being fully advised in the premises;
THE COURT HEREBY ORDERS that:

1. The hearing on the Objection as to Claim Number 2780 only, scheduled to be held on August 26, 2015 at 1:30 p.m., is adjourned to **October 28, 2015 at 1:30 p.m.**